

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,

Plaintiffs,

v.

ANDREA CABRAL, SUFFOLK COUNTY
SHERIFF'S DEPARTMENT, SUFFOLK
COUNTY, and CORRECTIONAL
MEDICAL SERVICES, INC.,

Defendants.

Civil Action No. 04-11935-DPW

**ASSENTED TO MOTION
OF
THE FEDERAL BUREAU OF INVESTIGATION
AND
THE UNITED STATES ATTORNEY'S OFFICE
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL**

The Respondents, Federal Bureau of Investigation (FBI) and the United States Attorney's Office (USAO), respectfully move for an extension of time until September 22, 2005, to respond to the Plaintiff's Motion to Compel Testimony and Documents From the FBI and the USAO. Good cause exists for this Motion.

Counsel for the Plaintiff's and undersigned counsel have conferred and continue to explore the possibility of resolving Plaintiff's information and testimony requests without further litigation. The additional time will allow for more thorough evaluation and discussion. Plaintiff's counsel has assented to this Motion.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose. Therefore, the United States respectfully request that the Court grant this Motion and approve the proposed extension of time for the United States to file its response until September 22, 2005.

Respectfully submitted,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Anton P. Giedt 9/15/05
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LOCAL RULE 7.1(A)(2) CERTIFICATION

Undersigned counsel certifies that pursuant to the requirements under Local Rule 7.1(A)(2), he has conferred with Plaintiff's counsel of record and that Plaintiff's counsel has assented to this motion.

/s/ Anton P. Giedt
Anton P. Giedt
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
DATE: September 15, 2005

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon counsel of record through electronic filing and by first class mail.

/s/ Anton P. Giedt
Anton P. Giedt
Assistant U.S. Attorney

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